

FEB 17 2000

Dr. Gordon Kuntz
Senior Environmental Scientist
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, Ohio 44115-1075

Re: November 1999 Draft Work Plan and Field Sampling and Analysis
Plan for RI/FS Activities; Gibbsboro, NJ

Dear Dr. Kuntz:

The U.S. Environmental Protection Agency (EPA) is in receipt of the November 19, 1999 *Draft Work Plan and Field Sampling and Analysis Plan for RI/FS Activities* for the U.S. Avenue Burn, Route 561 Dump, and Hilliard's Creek Sites in Gibbsboro, NJ, submitted by Roy F. Weston, Inc., on behalf of the Sherwin-Williams Company pursuant to the September 30, 1999 Administrative Order on Consent for Remedial Investigation/Feasibility Study (RI/FS).

Normally, EPA would have forwarded its comments to you by now. However, we are finding that the Work Plan is deficient in many areas and our comments are quite extensive. For instance, the Work Plan does not propose conducting any work at the Railroad Track portion of the U.S. Avenue Burn Site nor investigating Haney Run Brook. These are just a few of the deficiencies noted in the Work Plan and we are working to get our comments to you as soon as possible.

If you have any questions on this matter, you may contact me at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard at (212) 637-3216.

Sincerely,

Emmet C. Keveney
Remedial Project Manager
New Jersey Remediation Branch

cc: Allen Danzig, Esq., SWC
Theodore Toskos, Weston

bcc: Carl Howard, ORC 16th fl. ✓
Pat Evangelista, 2ERRD-NJRB, 19th fl.

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